REMARKS

Claims 1-30 were pending as of the action mailed on May 15, 2009. Claims 1, 11 and 20 are in independent form. Claims 2, 12 and 21 have been canceled. Claims 1, 11 and 20 have been amended. Reconsideration of the action is respectfully requested in light of the following remarks.
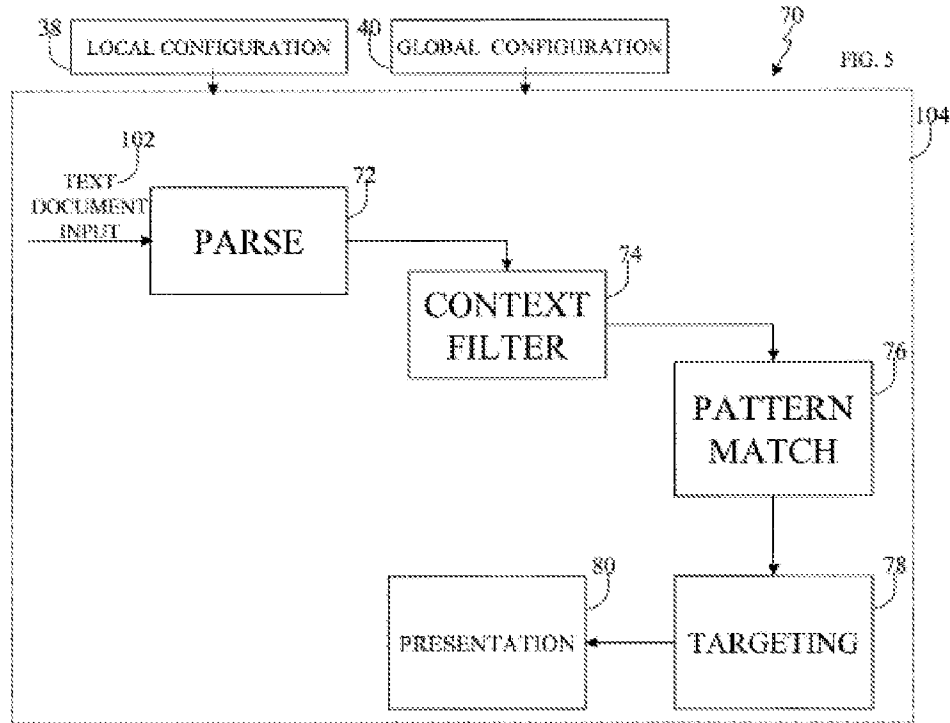
Section 103 Rejections

Claims 1-5, 8-14, 17-23 and 26-30 were rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over Goodisman (US 2002/0069223) in view of Golovchinsky (US 2004/0078757).

As amended, claim 1 reads as follows:

1.   A method for generating hyperlinks, comprising:

        locating a text reference in a source document, wherein locating the text reference comprises deriving the text reference based on a statistical model of at least one of text formatting and lexical cues;

        identifying a target document relating to the text reference, where the identifying includes performing a search using a search engine based on a query derived from the text reference and selecting the target document from one or more search results;

        deriving an anchor text corresponding to the target document using the located text reference in the source document;

        generating a hyperlink to the target document; and

        associating the hyperlink with the anchor text.

The Office asserted that Goodisman discloses deriving the text reference based on a statistical model of at least one of text formatting and lexical cues since Goodisman discloses

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"parsing the document based on the type of input document." However, the relied upon portion of Goodisman merely describes "parsing techniques" rather than the use of a statistical model.

As shown above in FIG. 5 from Goodisman, the linkify engine 104 receives a document 102 as input and processes the document using a parser 72 and a pattern matcher 76, neither of which disclose the use of a statistical model. In contrast, the parser 72 parses the document 102 into blocks based on one or more parsing techniques. See [0053]. For example, the parser 72 can divide the document 102 based on document format elements including HTML or XML tags, or textual elements including sentences, questions, line breaks, spaces, hyphens, dashes, strings of digits, strings of letters, groups of words, or images, icons, etc. Id. The pattern matcher 76 establishes relationships between the blocks. Id. Like the parser 72, the pattern matcher 76 also does not disclose use of a statistical model. Rather, the pattern matcher 76 can include a natural language processor or perform linguistic, keyword proximity, or word sequence analysis. Id.

Golovchinsky also fails to describe use of a statistical model in any capacity. Thus, Goodisman and Golovchinsky, alone or in combination, fail to describe this feature of claim 1.

Accordingly, claim 1 and its dependent claims are in condition for allowance. Claims 11 and 20, and their dependent claims, are in condition for allowance for at least the same reason as given for claim 1. The other relied upon references fail to remedy the deficiencies in Goodisman and Golovchinsky.

Conclusion

For the foregoing reasons, the applicant submits that all the claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant's selecting some particular arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that claim exist. Finally, the applicant's decision to amend or cancel any claim should not be understood as implying that the applicant agrees with any positions taken by the examiner with respect to that claim or other claims.

Please apply any other credits or charges to Deposit Account No. 06-1050.

Respectfully submitted,

Date: August 20, 2009_____

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